CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

ADMINISTRATIVE DRAFT INITIAL STUDY AND ENVIRONMENTAL CHECKLIST FOR TENTATIVE GENERAL WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES OF WASTE FROM COMMERCIAL AGRICULTURAL AND NURSERY OPERATIONS WITHIN THE SAN DIEGO REGION

DEVELOPED IN ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

PURSUANT TO PUBLIC RESOURCES CODE SECTIONS 21000 THROUGH 21177 AND CALIFORNIA CODE OF REGULATIONS TITLE 14 SECTIONS 15000 THROUGH 15387

Table of Contents

A. Project Title 1
B. Applicant 1
C. Applicant's Contact Person 1
D. Surrounding Land Uses and Setting 1
E. Project Description 2
Introduction 2
Background 2
Description of Proposed Activity 3
Analysis of Reasonably Foreseeable Method of Compliance 3
F. Environmental Impacts (California Environmental Quality Act Checklist) 5
Section 1. Aesthetics 6
Section 2. Agricultural and Foresty Resources 7
Section 3. Air Quality 9
Section 4. Biological Resources 11
Section 5. Cultural Resources 14
Section 6. Geology and Soils 15
Section 7. Greenhouse Gas Emissions 17
Section 8. Hazards and Hazardous Materials 18
Section 9. Hydrology and Water Quality 20
Section 10. Land Use and Planning 23
Section 11. Mineral Resources 24
Section 12. Noise 25
Section 13. Population and Housing 26
Section 14. Public Services 28
Section 15. Recreation 29
Section 16. Transportation / Traffice 30
Section 17. Utilities and Serivce Systems 32
Section 18. Mandatory Findings of Significance 34
G. Determination 36

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SAN DIEGO REGION
2375 NORTHSIDE DRIVE, SUITE 100, SAN DIEGO, CA 92108

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND ENVIRONMENTAL CHECKLIST

A. PROJECT TITLE:

Issuance of General Waste Discharge Requirements for Discharges from Agricultural and Nursery Operations within the San Diego Region

B. APPLICANT:

California Regional Water Quality Control Board, San Diego

C. APPLICANT'S CONTACT PERSON:

Roger Mitchell
California Regional Water Quality Control Board, San Diego Region
Groundwater Protection Branch
2375 Northside Drive, Suite 100**,** San Diego, CA 92108
roger.mitchell@waterboards.ca.gov

D. SURROUNDING LAND USES AND SETTING:

The San Diego Region forms the southwest corner of California and occupies approximately 3,900 square miles. The western boundary of the Region consists of the Pacific Ocean coastline. The northern boundary of the Region is formed by the hydrologic divide starting near Laguna Beach and extending inland through El Toro and easterly along the ridge of the Elsinore Mountains into the Cleveland National Forest. The eastern boundary of the Region is formed by the Laguna Mountains and other lesser known mountains located in the Cleveland National Forest. The southern boundary of the Region is formed by the United States-Mexico international border.

The San Diego Region encompasses most of San Diego County, parts of southwestern Riverside County, and southwestern Orange County. The Region is divided into a coastal plain area, a central mountain-valley area, and an eastern mountain-valley area. It consists of eleven hydrologic units that ultimately drain to the Pacific Ocean. The climate in the Region is generally mild with annual temperatures averaging around 65°F near the coastal areas. Average annual rainfall ranges from 9 to 11 inches along the coast to more than 30 inches in the eastern mountains. There are two distinct seasons in the Region. Summer dry weather occurs from late April to mid-October. During this period almost no rain falls. The winter season (mid-October through early April) consists of generally dry weather interspersed by occasional rain storms. Eighty-five to ninety percent of the annual rainfall occurs during the winter season.

The land use of the San Diego Region is highly variable. The coastline areas are highly concentrated with urban and residential land uses, and the inland areas primarily consist of open space. Most of the Region is occupied by open space or recreational land use, followed by low-density residential and agriculture/livestock land uses. Other major land uses are commercial/institutional, high-density residential, industrial/transportation, military, transitional, and water.

E. PROJECT DESCRIPTION:

Introduction:

The project entails the issuance of general waste discharge requirements (WDRs) and the implementation of a monitoring and reporting program (MRP) for discharges of wastes from commercial agricultural and nursery operations (Operations)[1] within the San Diego Region (collectively Ag Order). The purpose of the Ag Order is to replace Conditional Waiver No. 4 – Discharges from Agricultural and Nursery Operations (Ag Waiver), which expires in early 2014, and requires the:

- implementation of best management practices (BMPs) and effective management measures (MMs) to address potential impacts associated with storm water run on, runoff, irrigation return flows, wastes and waste waters discharged from Operations,
- implementation of a monitoring and reporting program (MRP) which prescribes performance standards to evaluate compliance with the Ag Order, and assess the potential impacts to, and the quality of, surface waters within the San Diego Region.

As required by California statue, the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) must comply with the requirements specified in the California Environmental Quality Act (CEQA) as part of the process of issuing the Ag Order. Under CEQA, the San Diego Water Board is the Lead Agency for evaluating the environmental impacts of the reasonably foreseeable methods of compliance with the proposed Ag Order.

Background:

Operations located within the San Diego Region have been subject to the requirements of an Ag Waiver since the adoption of Resolution No. 83-21 by the San Diego Water Board in 1983. In preparation for the adoption of Resolution No. 83-21, San Diego Water Board staff (Staff), acting as the Lead Agency for the project, developed an Initial Study and adopted a Negative Declaration concurrently with the Resolution No. 83-21.

Chaptered into law in 1999, Senate Bill 390 (SB-390) amended Water Code sections 13269 and 13350, requiring all waivers of WDRs issued by the State Water Resources Control Board or Regional Water Quality Control Board, be replaced with individual or general WDRs, or renewed for a period not to exceed five years, and contain conditional requirements and fees. In response

[1] Operations are defined in the proposed Ag Order as agricultural and nursery operations which generate $5,000 in gross sales of agricultural and nursery products, or would have grown and sold during the previous year, but for an event beyond the control of the Discharger.

to SB-390, the San Diego Water Board adopted Resolution No. R9-2002-0186,[2] renewing the Ag Waiver with conditions, and amending Chapter 4 (Implementation) of the Basin Plan to incorporate the "existing conditional waivers.

In accordance with Water Code section 13269, the San Diego Water Board adopted Resolution No. R9-2007-0104, renewing the Ag Waiver. The San Diego Water Board further directed Staff to develop a monitoring program to be implemented by enrollees in the Ag Waiver. Pursuant to Public Resources Code (PRC) section 21080.5, the Resources Agency has approved the San Diego Water Boards' basin planning process as a "certified regulatory program" that adequately satisfies the CEQA (PRC section 21000 et seq.) requirements for preparing environmental documents [California Code of Regulations Title (Calif. Code Regs. title) 14 section 15251(g) and title 23 section 3782]. As such, the documents supporting the San Diego Water Boards' proposed basin planning action contained the required environmental documentation, including an environmental checklist, under the CEQA, serving as "substitute documents" [Calif. Code Regs. title 23 section 3777], and satisfying the requirements of substitute documents for a Tier 1 environmental review under CEQA, pursuant to PRC section 21159 and Calif. Code Regs. title 14 section 15187. Currently the conditional waivers, including the Ag Waiver, are set to expire in early 2014.

Description of the Proposed Activity:

The issuance of the Ag Order will replace the Ag Waiver, and require the implementation of BMP and effective MMs to address potential impacts associated with storm water run on, runoff, irrigation return flows, wastes and wastewaters, discharged from Operations. Issuance of the Ag Order will also require Operations to implement a monitoring and reporting program, which will prescribe performance based standards to evaluate compliance with the Ag Order, and assess the potential impacts to, and the quality of, surface waters within the San Diego Region.

The proposed Ag Order will be issued in accordance with the provisions of Water Code sections 13260, 13263, and 13267 et seq., and in accordance with the State Water Resources Control Boards' Administrative Procedures Manual, would be not be subject to review for a period not less than 15 years. Once adopted, general WDRs can be terminated if the category of discharges does not meet the following criteria:

- Discharges are produced by the same or similar operations;
- Discharges involve the same or similar types of waste;
- Discharges require the same or similar treatment standards; and
- Discharges are more appropriately regulated under general WDRs than individual WDRs.

Analysis of Reasonably Foreseeable Methods of Compliance:

This section identifies a range of reasonably foreseeable method(s) of compliance with the Ag Order. While the environmental analysis will be limited to the discharges regulated by the Ag Order, the reasonably foreseeable methods of compliance that may be implemented by the

[2] Resolution No. R9-2002-0186, *Amendment to the Water Quality Control Plan for the San Diego Region (9) to Incorporate a Waste Discharge Requirement Policy for Certain Specific Types of Discharges, adopted in September 2002.*

dischargers will be similar to those that are used for the types of discharges eligible for enrollment in the Ag Order.

The most reasonably foreseeable methods that a discharger may utilize to comply with the requirements prescribed in the Ag Order include MMs and structural and non-structural BMPs. Typical non-structural and structural controls are described below.

Non-structural Controls: Non-structural controls typically are aimed at controlling sources of a pollutant and generally do not involve new construction. Because the types of discharge proposed to be eligible for the Ag Order are not expected to pose a significant threat to the environment, non-structural controls are expected to be the first methods to be utilized by the dischargers. No potentially significant adverse impacts on the environment were identified for these controls.

- *Proper Waste Management:* Proper management of where and how wastes are discharged to minimize or eliminate the potential for erosion and pollutants to impact waters of the State. Proper waste management can include, but is not limited to, moving and/or discharging wastes to areas with adequate distance from surface waters and groundwater, ensuring the waste discharge area will minimize or eliminate the discharge of runoff to waters of the State, or ensure waste is not exposed to surface runoff that can transport pollutants (via overland flow or infiltration) to waters of the State. Proper waste management also includes complying with local, state, and federal ordinances and regulations and obtaining any required approvals, permits, certifications, and/or licenses from authorized local agencies.
- *Facility Inspection and Maintenance:* Conduct regular inspections of facilities to identify potential sources of pollutants and locations where discharged wastes may potentially impact waters of the State. Routine inspection and maintenance is an efficient way to prevent potential nuisance situations (e.g., odors, mosquitoes, weeds, etc.), to minimize or eliminate the potential for erosion and pollutants to impact waters of the State, and to reduce the need for repair maintenance.
- *Facility Management Plans:* For facilities that use any products (e.g., fertilizers, pesticides, etc.) or discharge any wastes on site, adopt a facility management plan to ensure that products and wastes are stored, used, and disposed of in ways that minimize exposure to storm water or surface runoff that can transport pollutants to waters of the State. Products and some wastes (e.g., compost, plant crop residues), when used properly, may also reduce surface runoff and runoff velocity, which can reduce or eliminate erosion and discharges of pollutants to waters of the State.
- *Design, Sizing and Location of Facilities:* Properly design, size, and site facilities to minimize or eliminate the potential for pollutants to impact surface waters or groundwater.
- *Education:* Dischargers should become educated about the Ag Order and discharge specifications, potential sources of pollutants at their facility, and methods that may be implemented to comply with the Ag Order. When dischargers become educated about pollutants and their potential impacts, they can implement measures to reduce or eliminate the potential for pollutants to reach and impact waters of the State.

Structural Controls: Structural controls may be utilized to divert, store, and/or treat discharges of waste. Structural controls can involve activities that can potentially impact the environment. However, because the types of discharge proposed to be eligible for the Ag Order are not expected to pose a significant threat to the environment, the reasonably foreseeable structural controls that may be implemented by the dischargers are not expected to have significant construction or operation requirements. The reasonably foreseeable structural controls are expected to have less than significant and/or short-term impacts on the environment.

- *Buffer Strips and Vegetated Swales:* Construct and/or maintain vegetative buffer strips around and within a facility to slow surface runoff velocity, filter pollutants, and increase surface runoff infiltration.
- *Infiltration Trenches:* Construct and maintain infiltration trenches designed to capture and naturally filter surface runoff.
- *Diversion and Containment Systems:* Install diversion and containment systems to capture surface runoff and/or prevent discharge of pollutants. Surface runoff may be diverted and contained for reuse on site, or it may be diverted to wastewater collection plants for treatment. Diversion and containment systems consist of berms, roofs, liners, or enclosures to drain surface runoff away from discharged wastes, capture runoff from discharged wastes, and/or contain and isolate discharged wastes.

F. ENVIRONMENTAL IMPACTS:

This project may potentially affect the following checked environmental factors. See the checklist on the following pages for more details.

- ☐ Aesthetics
- ☐ Agriculture and Forestry Resources
- ☒ Air Quality
- ☒ Biological Resources
- ☐ Cultural Resources
- ☒ Geology/Soils
- ☒ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☒ Hydrology/Water Quality
- ☐ Land Use/Planning
- ☐ Energy and Mineral Resources
- ☒ Noise
- ☐ Population/Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation/Traffic
- ☐ Utilities/Service Systems
- ☒ Mandatory Findings of Significance

Section 1. **AESTHETICS.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

DISCUSSION

a) **No impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would result in the obstruction of the view of a scenic vista, substantially damage scenic resources, degrade the existing visual character or quality of a site or its surroundings, or create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

b) **No impact**. See response to section F.1.a above.

c) **No Impact**. See response to section F.1.a above.

d) **No Impact**. See response to section F.1.a above.

Section 2. **AGRICULTURAL AND FOREST RESOURCES.** In determining whether impacts to agricultural resources are significant environmental impacts, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land [as defined in PRC section 12220(g)] or timberland (as defined by PRC section 4526)?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

DISCUSSION

a) **Impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would result in conversion of farmland to non-agricultural uses.

b) **No Impact.** Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale to affect zoning designations established by local land use jurisdictions.

c) **No Impact**. See response to section F.2.b above.

d) **No Impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use.

e) **No Impact.** Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Section 3. **AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in obstruction of an applicable air quality plan.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial air emissions or deterioration of air quality, or result in obstruction of an applicable air quality plan.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial air emissions or deterioration of air quality, or result in exposure of sensitive receptors to substantial pollutant concentrations.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial air emissions or deterioration of air quality, or result in a considerable net increase of any criteria pollutants.

e) **Less than Significant**. Construction and installation of structural controls may result in objectionable odors in the short-term due to exhaust from construction equipment and vehicles, but no more so than during typical construction activities currently performed. Structural controls may be a source of objectionable odors if structural control designs allow for water stagnation or collection of water with sulfur-containing compounds. Storm water runoff is not likely to include sulfur-containing compounds, but stagnant water could create objectionable odors. However, reasonably foreseeable structural controls are not expected to be on a scale large enough that would result in the significant creation of objectionable odors.

Section 4. **BIOLOGICAL RESOURCES.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (DFW) or United States Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the DFW or USFWS?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, *etc.*) through direct removal, filling, hydrological interruption or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION

a) **Less than Significant**. Implementing non-structural controls will not directly result in substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the DFW or USFWS, because the controls would not introduce any physical effects that could impact these characteristics. However, the reduction or elimination of nuisance flows could result in change in the diversity of species, or numbers of any species, due to a reduction of dry weather flows that could eliminate in-stream habitats dependent on those flows. This would return dry weather flows in the watersheds to a more natural, pre-development condition. Species that thrived in the creeks in the absence of nuisance flows should not be adversely impacted by habitat changes if the flows are eliminated. Impeding the propagation of invasive species is not an adverse impact.

The installation of structural controls such as vegetated swales or buffer strips could increase the diversity or number of species, which is beneficial by creating habitat for those species. Structural controls could also divert, or reduce storm water runoff discharge, which could decrease the number and/or diversity of species within the stream channels by eliminating habitat dependent on those flows. However, native communities of species can thrive under lower stream flow conditions than what currently exist. Projects that may implement structural controls to comply with the Ag Order requirements are not expected to be of the size or scale that could result in change in a significantly adverse change in diversity of species, or numbers of any species.

b) **Less than Significant**. Implementing non-structural controls will not directly result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the DFW or USFWS because the controls would not introduce any physical effects that could impact these characteristics.

Depending on the type of discharge and/or structural controls selected, direct or indirect impacts to special-status plant species may occur during and after the waste discharge and/or construction of structural controls. However, when the specific projects are developed and sites identified, a focused protocol plant survey and/or a search of the California Natural Diversity Database should be performed to confirm that any potentially sensitive or special status species in the site area are properly identified and protected as necessary. If sensitive species occur on the project site, mitigation is required in accordance with the Endangered Species Act. Mitigation measures should be developed in consultation with the DFW and USFWS. Therefore, if a discharger chooses to implement structural controls, they can and should avoid affecting habitat that is vital for the survival of any unique, rare, or endangered species. Projects that may implement structural controls to comply with the Ag Order requirements are not expected to be of the size or scale that could result in a significant adverse effect on any riparian habitat or sensitive natural community.

c) **No Impact.** Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in direct removal or filling of riparian habitat, wetlands, or any sensitive natural communities.

d) **Less than Significant**. Implementing non-structural controls will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with

established native resident or migratory corridors, or impede the use of native wildlife nursery sites because the controls would not introduce any physical effects that could impact these characteristics. However, the reduction or elimination of nuisance flows could result in a barrier to the migration or movement of animals especially in the dry weather season by eliminating habitat dependent on those flows. This would cause dry weather flows to return to a more natural, pre-development condition. Animal species that thrived in the creek and stream channels in the absence of nuisance flows should not be adversely impacted by habitat changes if the flows are eliminated. Impeding the propagation of invasive species is not an adverse impact.

Implementing structural controls would not foreseeably introduce new species. Construction of reasonably foreseeable structural controls likely would not restrict wildlife movement because the sizes of structural controls are generally too small to obstruct a corridor. For terrestrial animals, corridors would be maintained regardless of stream flow since reduced flows would not provide physical barriers for these animals. In the event that any structural controls built, such as animal exclusions, that may impede some wildlife migration, fence gaps large enough to allow migrating wildlife to pass through could be included in the design. Projects that may implement structural controls to comply with the Ag Order are not expected to be of the size or scale that could result in a significant introduction of new species of animals into an area, or in a barrier to the migration or movement of animals.

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) **No Impact**. See responses to sections F.4.a through F.4.e above.

Section 5. **CULTURAL RESOURCES.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Calif. Code Regs. title 14 section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in Calif. Code Regs. title 14 section15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in a substantial adverse change in the significance of a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains.

b) **No Impact**. See response to section F.5.a above.

c) **No Impact**. See response to section F.5.a above.

d) **No Impact**. See response to section F.5.a above.

Section 6. **GEOLOGY and SOILS.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines & Geology Special Publication No. 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

DISCUSSION

a) **No Impact.** Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in exposure of people or structures to geologic hazards because none of these controls would result in earth moving activities. This also response applies to sub-issue sections F.6.a.i through F.6.a.iv.

b) **Less than Significant Impact**. Reasonably foreseeable non-structural controls are not expected to be on a large enough scale that would result in increase in wind or water erosion of soils, either on or off site because none of the non-structural controls would result in increased surface runoff discharge, or in exposing soils to erosion by wind and water.

Depending on the structural controls selected, the proposal may result in minor soil excavation during construction of structural controls. However, construction related erosion impacts will cease with the cessation of construction. Wind or water erosion of soils may occur as a potential short-term impact. Typical established MMs/BMPs should be used during implementation to minimize offsite sediment runoff or deposition. Construction sites are required to retain sediment on site, both under general construction storm water WDRs and through the construction program of the applicable MS4 WDRs; both of which are already designed to minimize or eliminate erosion impacts on receiving waters. Projects that may implement structural controls to comply with the Ag Order are not expected to be of the size or scale that could result in significant erosion of soils, either on or off the site.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls will not be located in unstable geologic units and are not expected to be on a scale large to potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. In addition, see response to section F.6.a above.

d) **No Impact**. Reasonably foreseeable non-structural and/or structure controls will not be located in unstable geologic units and are not expected to be on a scale large to potentially result in loss of life or property resulting from soil expansion. In addition, see response to section F.6.a above.

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls will not have any effect on siting of septic tanks or alternate wastewater disposal systems. Any projects seeking enrollment in the conditional waiver for onsite graywater systems must meet applicable county design and siting criteria, and obtain all required permits from the appropriate Local County or City Agency.

Section 7. **GREENHOUSE GAS EMISSIONS.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

DISCUSSION

a) **Less than Significant Impact**. Construction and installation of structural controls may result in generation of greenhouse gases in the short-term due to exhaust from construction equipment and vehicles, but no more so than during typical construction activities currently performed. These reasonably foreseeable structural controls, however, are not expected to be on a scale large enough that would result in the significant generation of greenhouse gases.

b) **Less than Significant Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in conflict with any applicable plan, policy or agency adopted regulation for the purpose of reducing the emissions of greenhouse gases.

Section 8. **HAZARDS and HAZARDOUS MATERIALS.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	☐	☐	☐	☒
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and structural controls are not expected to be of a large enough scale that would create a significant hazard to the environment from transport or disposal of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation).

b) **No Impact.** Reasonably foreseeable non-structural and structural controls will not result in a release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation) as a result of a reasonably foreseeable upset or accident conditions. The reasonably foreseeable non-structural and structural BMPs included in this evaluation would not be subject to the release of hazardous substances in the event of an accident because these types of substances would not be present.

c) **No Impact.** Reasonably foreseeable non-structural and structural controls will not involve emission or handling of hazardous substances or waste**.** In addition the Ag Order would not induce a project that would involve emission or generation of hazardous wastes. However, individual projects would also have to prepare a separate CEQA analysis which must evaluate impacts from hazards and hazardous materials, and obtain any necessary permits from the appropriate public or government agencies**.**

d) **No Impact.** Reasonably foreseeable non-structural or structural controls will not result in a safety hazard to people working or residing within an area within an airport land use area, two miles of an airport, or a private airstrip. In addition the Ag Order would not induce a project that would be located within an airport land use plan. However, individual projects would also have to prepare a separate CEQA analysis which must evaluate impacts from hazards and hazardous materials, and obtain any necessary permits from the appropriate public or government agencies.

e) **No Impact.** See response to section F.8.d above.

f) **No Impact.** See response to section F.8.d above.

Section 9. **HYDROLOGY and WATER QUALITY.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (*e.g.*, the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

9. HYDROLOGY and WATER QUALITY (*continued).* Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place housing within a 100-year flood hazard area structures which would impede or redirect flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

DISCUSSION

a) **Less than Significant Impact**. Non-structural and/or structural controls that promote or utilize infiltration of surface runoff may locally increase the quantity and/or minimally degrade the quality of groundwaters. The increase in localized quantity of surface runoff is unlikely to have any adverse effects since, under pre-development conditions, infiltration rates of storm water runoff to groundwater were most likely much higher than they are today due to the absence of hardscapes. Additionally, non-structural and/or structural controls are not expected to significantly degrade groundwater because the types of discharge, if discharged in accordance with the Ag Order, would not pose a threat to the quality or beneficial uses of waters of the State.

b) **No Impact**. Non-structural and/or structural controls that promote or utilize infiltration of surface runoff may increase the quantity of groundwaters. The increase in quantity is unlikely to have any adverse effects since, under pre-development conditions, infiltration rates of storm water runoff to groundwater were most likely much higher than they are today due to the absence of hardscapes.

c) **No Impact**. Non-structural controls would not be of the size or scale to result in changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff because none of these controls would introduce any physical effects that could impact these characteristics.

d) **Less than Significant Impact**. Non-structural controls would not result in changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff because none of these controls would introduce any physical effects that could impact these characteristics.

Depending on the structural controls selected, absorption rates, drainage patterns, and surface water runoff resulting in flooding on- or off-site may change. Grading and excavation during construction and installation of structural controls could result in alterations in absorption rates, drainage patterns, and surface water runoff. Several types of structural controls collect and/or inhibit surface water runoff flow, which would likely alter drainage patterns, and also decrease the rate and amount of surface water runoff. For example, structural controls such as buffer strips would change drainage patterns by increasing absorption rates, which would reduce the amount of surface water runoff to creeks. If surface water runoff is diverted to wastewater treatment facilities, thereby reducing the overall flow, the erosion and scour that would normally be caused in the streams by surface water runoff would be reduced. The amount of flow within the stream channel may change; however, the channelized drainage pattern would remain essentially unchanged. Projects that may implement structural controls to comply with the Ag Order are not expected to be of the size or scale that could result in significant changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff.

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

f) **Less than Significant**. See response to section F.9.a above.

g) **No Impact**. The project does not entail construction of new housing. The Ag Order will also not induce or approve construction of new housing. Any housing or construction project would have to prepare a separate project level CEQA analysis for the construction project which must evaluate impacts to hydrology and water quality, and obtain any necessary permits from the appropriate public or government agencies (e.g., building permits, clearing and grading permits, or permits under the Federal Clean Water Act, etc) to the extent required.

h) **No Impact**. Reasonably foreseeable structural controls are not expected to be of the size or scale that would place housing in a 100-year flood hazard area. In addition see response to section F.9.g above.

i) **No Impact.** Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in exposure of people or property to water related hazards such as flooding.

j) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in exposure of people or property to water related hazards such as inundation by seiche, tsunami, or mudflow.

Section 10. **LAND USE AND PLANNING.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in physical division of a community.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in Conflict with any applicable habitat conservation plan or natural community conservation plan.

Section 11. **MINERAL RESOURCES**. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in loss of availability of a known mineral resource.

b) **No Impact.** Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Section 12. **NOISE.** Would the project result in:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing in or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing in or working in the project area to excessive noise levels?	☐	☐	☒	☐

DISCUSSION

a) **No Impact**. Non-structural controls would not result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. None of these controls would introduce any physical effects that could impact these characteristics.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not result in exposure to, or generation of, excessive groundborne vibration or groundborne noise levels

because the controls would not introduce any physical effects that could impact these characteristics.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not result in a substantial permanent increase in ambient noise levels in the project vicinity because the controls would not introduce any physical effects that could impact these characteristics.

d) **Less than Significant Impact**. The construction and installation of structural controls could result in minimal temporary increases in existing noise levels, but this would be short term and only exist until construction is completed. Therefore, this noise impact is less than significant.

e) **Less than Significant Impact**. Reasonably foreseeable non-structural and/or structural controls would not expose people residing in or working in the project area to excessive noise levels because the controls would not introduce any physical effects that could impact these characteristics.

The construction and installation of structural controls would result in temporary increases in existing noise levels, but this would be short term and only exist until construction is completed. Therefore, this noise impact is less than significant.

f) **Less than Significant Impact**. See response to section F.12.e above.

Section 13. **POPULATION AND HOUSING.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area either directly (*e.g.*, by proposing new homes and businesses) or indirectly (*e.g.*, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would alter the location, distribution, density, or growth rate of the human population of an area.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would displace substantial numbers of people or housing necessitating the construction of replacement housing elsewhere.

c) **No Impact**. See response to section F.13.b above.

Section 14. **PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a need for new or altered fire protection services, police protection services, schools, parks, or other public facilities.

b) **No Impact**. See response to section F.14.a above.

c) **No Impact**. See response to section F.14.a above.

d) **No Impact**. See response to section F.14.a above.

e) **No Impact**. See response to section F.14.a above.

Section 15. **RECREATION.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

DISCUSSION

a) **No Impact.** Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in an increase in use of existing neighborhood and regional parks or other recreational facilities; nor would the controls be of the size or scale to cause substantial physical deterioration of recreational facilities because need for new or altered fire protection services, police protection services, schools, parks, or other public facilities.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would include or require construction or expansion of recreational facilities.

Section 16. **TRANSPORTATION / TRAFFIC.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in exceeding capacity of the existing circulation system.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in conflict with an applicable congestion management plan.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a change to air traffic patterns, or alterations to air traffic.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in substantial increase in hazards due to a design feature due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in inadequate emergency access.

f) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a conflict with adopted policies, plans, or programs supporting alternative transportation.

Section 17. **UTILITIES AND SERVICE SYSTEMS.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a need for wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts. However, construction of new water reclamation plants, or expansion of existing water reclamation plants, may result in recycled water discharges for irrigation, which may be regulated by adopted waste discharge or reclamation requirements.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in the construction of new storm water drainage facilities or expansion of existing facilities.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a substantial increase in water use, or result in the need for new or substantial alterations to water supplies.

e) **No Impact**. See response to section F.17.b above.

f) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a construction of new landfills or expansion of existing landfills.

g) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in violation of federal, state, and local statutes related to solid waste.

Section 18. **MANDATORY FINDINGS OF SIGNIFICANCE.** Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☐	☐	☒	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

DISCUSSION

a) **Less than Significant Impact**. As discussed above in the Biological Resources section F.4 of this Initial Study, plant and animal species could potentially be affected due to the reduction or elimination of nuisance flows, especially in the dry weather season. However, projects that may implement non-structural and/or structural controls to comply with the Ag Order are not expected to be of the size or scale that could result in significant changes that could have an adverse effect on native plant and animal species. In addition, individual projects would also have to prepare a separate project level CEQA analysis that must evaluate impacts to biological resources, and obtain any necessary permits from the appropriate public or government agencies.

b) **Less than Significant Impact**. Cumulative impacts, defined in Cal. Code Regs. title 14 section 15355 (i.e., CEQA Guidelines), refer to two or more individual effects, that when considered together, are considerable or that increase other environmental impacts. Cumulative impacts associated with complying with the Ag Order and other water quality control programs are expected to be less than significant, because effective non-structural controls are not expected to have any adverse impacts, and will most likely be an initial strategy for complying with the Ag Order.

The dischargers may opt to use structural controls to minimize or eliminate erosion and the transport of pollutants to the waters of the State, which would increase the likelihood of potential impacts to the environment that are cumulatively considerable. Present and future specific projects and other construction activities may result in short-term cumulative impacts. The construction of structural controls, along with other construction and maintenance projects, could have short-term cumulative effects. However, these effects are not cumulatively considerable in the long-term because the effects will cease with the completion of construction.

If the dischargers comply with the Ag Order, any potential impacts on the environment will be less than significant. Additionally, projects that may implement non-structural and/or structural controls to comply with the Ag Order are not expected to be of the size or scale that could result in any significant impacts on the environment, even when considered cumulatively.

c) **No Impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of a size or scale that would cause substantial adverse effects on human beings, either directly or indirectly.

G. DETERMINATION

On the basis of this initial evaluation:

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared By:

_____

Roger Mitchell, Engineering Geologist Date: TENTATIVE
California Regional Water Quality Control Board, San Diego Region
Groundwater Protection Branch